

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/24/23

**Zemel Law**  
Consumer Protection

DANIEL ZEMEL, ESQ. (NY, NJ)  
660 BROADWAY  
PATERSON, NEW JERSEY 07514  
PHONE: (862) 227-3106  
FAX: (862) 204-5901  
DZ@ZEMELLAWLLC.COM

April 24, 2023

**VIA ECF:**

Judge Colleen McMahon, USDJ  
40 Foley Square  
New York, NY 10007  
United States District Court  
Southern District of New York

4/24/2023  
OK - we will file  
reschedule  
initial conference

Re: *Raytman v. JP Morgan Chase Bank, N.A.*  
Case No.: 1:23-cv-01795-CM  
Letter Motion for Extension of Time to Respond to  
Defendant's Motion to Dismiss

Honorable Court,

My firm represents Plaintiff Alexander Raytman. I write to request an extension of time to respond to Defendant's Motion to Dismiss. Currently, the response deadline to the motion is May 1, 2023. I am currently scheduled for a jury trial on May 8, 2023. In order to focus my time and effort on trial preparation and pre trial motions, I'd like to request a 30 day extension of time to respond to Defendant's Motion. This would put the response to the Motion as May 30, 2023. This is the first extension request.

Defendant consents to the extension request.

Separately, in light of the extension request, both parties request adjournment of the current May 18, 2023 initial telephone conference.

Thank you for your attention to this matter.

Respectfully,

*/s/ Daniel Zemel*  
Daniel Zemel, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of April 2023 true and correct copy of the foregoing document was served on Defendant's counsel of record.

/s/Daniel Zemel  
Daniel Zemel, Esq.